

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

<b>In re:</b>	:	
	:	<b>Case No.: 16-21018</b>
<b>Thomas J. Hayes</b>	:	<b>Chapter 13</b>
	:	<b>Judge Carlota M. Böhm</b>
<b>Debtor(s)</b>	:	
	:	<b>Hearing Date: 03/01/2021</b>
<b>Thomas J. Hayes</b>	:	<b>Response Date: 02/15/2021</b>
<b>Movant</b>	:	
	:	<b>Related Document No.: 174</b>
<b>v.</b>	:	
	:	
<b>Select Portfolio Servicing, Inc.</b>	:	
<b>Respondent</b>	:	

**CONSENT MOTION FOR EXTENSION OF TIME TO RESPOND TO DEBTOR'S  
MOTION TO COMPEL AND TO CONTINUE HEARING**

Select Portfolio Servicing, Inc. ("Respondent"), by and through its undersigned counsel, hereby submits the following Consent Motion For Extension of Time to Respond to the Motion to Compel filed by Debtor Thomas J. Hayes ("Debtor") and to Continue the Hearing on the Motion to Compel currently scheduled for March 1, 2021 at 10:00 AM, and avers as follows:

1. Debtor filed a Motion to Compel on January 29, 2021. *See* Doc. No. 174.
2. Respondent's deadline to respond to the Motion to Compel is February 15, 2021 and a hearing on the Motion to Compel is currently scheduled for March 1, 2021 at 10:00 AM. *See* Doc. No. 177.
3. The undersigned firm was recently retained by Respondent in connection with the Motion to Compel and entered an appearance in this matter on February 11, 2021. *See* Doc. No. 183.
4. Shortly after being retained, the undersigned contacted Debtor's counsel, Mark B. Peduto, to discuss this matter and to request an extension of time to respond to the Motion to

Compel so Respondent could complete an analysis and provide further information regarding the basis for the January 12, 2021 letter relating to Debtor's loss mitigation application.

5. Debtor's counsel agreed to extend Respondent's deadline to respond to the Motion to Compel from February 15, 2021 to March 1, 2021 and to request that the Court continue the March 1, 2021 hearing to the first available hearing date on or after March 15, 2021.

6. Respondent now files this Consent Motion, and accompanying Proposed Order, to memorialize the agreement between Debtor and Respondent and to request the Court approve the agreement and continue the March 1, 2021 hearing date.

7. The undersigned has presented this Consent Motion to Debtor's counsel who, by virtue of his electronic signature below, has confirmed his consent.

WHEREFORE, Debtor and Respondent respectfully request that the Court issue an Order on consent of counsel for Debtor and Respondent extending Respondent's deadline to respond to Debtor's Motion to Compel and continuing the hearing scheduled for March 1, 2021 to the first available date on or after March 15, 2021.

**CALAIARO VALENCIK**

/s/ Mark B. Peduto

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Thomas J. Hayes

Dated: February 11, 2021

**PARKER IBRAHIM & BERG LLP**

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Dated: February 11, 2021